

QUIN DENVIR, Bar #49374
Federal Defender
MARK J. REICHEL, Bar #155034
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, California 95814
Telephone: (916) 498-5700

Attorney for Defendant
MIGUEL ANGEL SANCHEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	
)	Case No. CR.S-04-381-FCD
Plaintiff,)	
)	
v.)	STIPULATION AND ORDER;
)	EXCLUSION OF TIME
)	
)	
MIGUEL ANGEL SANCHEZ, et al.,)	Date: June 20, 2005
)	Time: 9:30 a.m.
Defendant.)	Judge: Honorable Frank C. Damrell

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, SAMUEL WONG, Assistant United States Attorney, attorney for Plaintiff, MARK J. REICHEL, CHRIS HAYDEN-MAYER, ESQ., JESSE SANTANA, ESQ., attorneys for all defendants, that the previously scheduled change of plea hearing date of May 31, 2005 be vacated and the matter set for change of plea on June 20, 2005 at 9:30 am.

This continuance is requested because defense counsel Reichel will be out of town on training May 31st through June 6th. As well, all defense counsel also need additional time to review discovery with the defendant, conduct legal research, perform background factual

Stip and Order

1 investigation, and properly prepare for a potential change of plea.

2 Accordingly, all counsel and the defendant agree that time under
3 the Speedy Trial Act from the date this stipulation is lodged, through
4 June 20, 2005, should be excluded in computing the time within which
5 trial must commence under the Speedy Trial Act, pursuant to Title 18
6 U.S.C. § 3161 (H) (8) (B) (iv) and Local Code T4. Additionally, there is
7 a motion pending in the magistrate court which is scheduled for July
8 15, 2005, so time will be excluded under Local Code E up until that
9 time, July 15, 2005.

10 DATED: May 27, 2005.

Respectfully submitted,

11 QUIN DENVIR
12 Federal Public Defender

13 DATED: May 27, 2005.

14 /s/MARK J. REICHEL
15 MARK J. REICHEL
16 Assistant Federal Defender
17 Attorney for Defendant

18 /s/MARK J. REICHEL
19 CHRISTOPHER HAYDEN MEYER, ESQ
20 Attorney for Defendant

21 /s/MARK J. REICHEL
22 JESSE SANTANA, ESQ
23 Attorney for Defendant

24 MCGREGOR SCOTT
25 United States Attorney

26 DATED: May 27, 2005.

27 /s/MARK J. REICHEL for
28 SAMUEL WONG
Assistant U.S. Attorney
Attorney for Plaintiff

O R D E R

That the previously scheduled change of plea hearing date of May 31, 2005 be vacated and the matter set for change of plea on June 20, 2005 at 9:30 am.

The court finds that the interests of justice in granting the continuance outweighs the public's interest in a speedy trial and therefore time is excluded in the interests of justice pursuant to 18 U.S.C. § 3161 (H) (8) (B) (iv) and Local Code T4 and Local Code E.

IT IS SO ORDERED.

DATED: May 27, 2005

/s/ Frank C. Damrell Jr.
FRANK C. DAMRELL, JR.
United States DISTRICT JUDGE